

City of Burbank
Industrial Source Reduction and Control Program
Enforcement Response Plan

INTRODUCTION

The City of Burbank is responsible for implementing the Industrial Source Reduction and Control Program as described in 40 CFR 403 et seq, Government Code Sections 54739, 54740 and 54740.5, and Burbank Municipal Code Chapter 25. The City of Burbank is also responsible for implementing the Industrial/Commercial Facilities Program as described in the Los Angeles County Municipal Storm Water Permit (Regional Water Quality Control Board Los Angeles Region Order 01-182). The goal is to maintain compliance through a proactive program of monitoring and education.

However, noncompliance and discharges may occur. In order to deal with noncompliance in a just, efficient and effective manner, the City has developed this Enforcement Response Plan.

It is the policy of the City to:

- Identify and respond to noncompliance as quickly as possible, in order to minimize impact on the City's collection system and storm water conveyance system;
- Document all noncompliance;
- Investigate noncompliance thoroughly and expeditiously;
- Ensure that enforcement actions are dictated by the severity of the violation;

Informal discussions between Inspectors and dischargers to identify and correct noncompliance are encouraged and supported. Each Inspector is trained to select an enforcement response by considering and evaluating instances of noncompliance using the following criteria:

Magnitude of the violation;
Duration of the violation;
Effect of the violation on BWRP compliance with NPDES permit;
Effect of the violation on the operation of the BWRP and its collection system;
Compliance history of the discharger; and
Good faith of the discharger.

However, all instances of Significant Non Compliance (SNC) result in issuance of an Administrative Order of Compliance (AO). The Inspector may issue an Emergency Suspension (Cease and Desist) on his/her own authority, within the guidelines of this Plan.

- Take enforcement action in a timely manner;
All instances of noncompliance are reviewed and addressed within five working days of their discovery. Initial enforcement responses (involving contact with the user and requesting information on corrective or preventative action(s)) will occur within 15 days of violation detection.
Follow-up actions for continuing or recurring violations will be taken within 60 days of the initial enforcement response. For all continuing violations, the response will include a compliance schedule. Violations which threaten health, property or environmental quality are considered emergencies and will receive immediate responses, such as halting the discharge or terminating service. All violations meeting the criteria for significant noncompliance will be addressed with an enforceable order within 30 days of the identification of significant noncompliance.

- Respond to noncompliance in a consistent and objective manner. The Enforcement Response Guide (ERG)(Appendix A) is employed in order to realize this policy objective.

DEFINITIONS

Terms in this Plan and the ERG are to be interpreted as follows:

Adverse Impact: A detrimental effect upon water quality or beneficial uses caused by discharge or loading of pollutants.

Administrative Order (AO): A document which orders the violator to perform a specific act or refrain from an act. For example, the order may require users to attend a show cause meeting, cease and desist discharging, or undertake activities pursuant to a compliance order.

Cease and Desist Order (CDO): An administrative order directing a user to immediately halt illegal or unauthorized discharges.

Compliance Meeting: A formal meeting requiring the user to appear and explain the occurrence of a violation and present a plan to correct and prevent further occurrences. The meeting cost shall be the responsibility of the noncompliant user. Cost shall be determined by the fees established in the Burbank Fee Resolution.

Consent Order: An administrative order negotiated between the user and the City whereby a schedule of events is established.

Enforceable Order: A formal enforcement action, including, but not limited to, a Notice of Violation (NOV), a Consent Order, an Administrative Order to Show Cause, an Administrative Order of Compliance, and an Administrative Order to Cease and Desist.

Enforcement Officer: A designee of the City authorized by the Director of Public Works to resolve noncompliance addressed by a Notice of Violation.

Exceedance: A discharge containing an amount of a regulated constituent that is more than the allowed amount as listed in a Waste Discharge Permit or Administrative Order or BMC 25.

Harm: A condition or event damaging the collection system, producing pass-through or interference at the BWRP, or the storm water conveyance system, or endangering City personnel or the public, or causing a public nuisance.

Hearing Officer (HO): An employee of the City appointed by the City Council to resolve noncompliance.

Informal: Enforcement activity conducted by the Inspector where the violation is isolated and causing no harm and the user is cooperative in resolving its problems.

Inspector: A designee of the City authorized by the Director of Public Works to carry out the City's Industrial Source Reduction and Control Program.

Isolated: A condition or event that has not occurred previously and has a minimum potential for recurrence.

No harm: A condition or event without the potential to cause damage to the collection system, produce pass-through or interference at the BWRP, or storm water conveyance system, or endanger City personnel or the public, or cause a public nuisance.

Noncompliance: An event or condition at a user that is prohibited by BMC 25, Permit, or Order. A violation.

Notice of Violation (NOV): A document notifying a user that it has violated pretreatment and storm water standards and requirements. Generally used when the violation is relatively minor and the City expects the violation to be corrected within a short period of time.

Recurring: A condition or event that has occurred previously or not ended.

Principal Civil Engineer: An employee of the City assigned and authorized by the Director of Public Works to issue Administrative Orders and oversee the City's Pretreatment and Storm Water Program.

Show Cause Order: An administrative order to show cause why a proposed enforcement action should not be taken.

Significant NonCompliance (SNC): An event or condition at a user that meets one or more of the following criteria:

- a) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all of the measurements taken during a six month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;
- b) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent or more of all the measurements for each pollutant parameter taken during a six month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH);
- c) Any other violation of a pretreatment effluent limit (daily maximum or longer term average) that the City determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of BWRP personnel or the general public);
- d) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the City's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge;
- e) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a Waste Discharge Permit or enforcement order, for starting construction, completing construction, or attaining final compliance;
- f) Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90 day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- g) Failure to accurately report noncompliance
- h) Any other violation or group of violations which the City determines will adversely affect the operation or implementation of its pretreatment program.

Violation: See Noncompliance.

DUTIES OF
INDUSTRIAL SOURCE REDUCTION AND CONTROL PROGRAM PERSONNEL

Inspector's Responsibilities:

1. Identifying noncompliance.

Routine inspection will reveal the compliance status of a user. Practices that are out of the ordinary will receive particular attention to ensure they are within the conditions and limitations imposed by BMC 25, control mechanism, CRWQCB Order No. 01-182, or order. Inspectors document their observations in their inspection reports, and may then refer to standards to establish the compliance status.

2. Documenting noncompliance in an Inspection Report.

Each violation (of BMC 25 or control mechanism or CRWQCB No. 01-182 or order) uncovered during an inspection shall be documented in an Inspection Report and investigated. Each violation shall be referenced on the Inspection Report to the standard setting forth the condition or limitation violated.

3. Investigating and documenting noncompliance.

The investigation may include, but shall not be limited to:

- A records review,
- Material Safety Data Sheet (MSDS) review,
- Interviewing user personnel,
- Process verification,
- Pretreatment equipment upkeep,
- Calibration of process & pretreatment monitors,
- Chemical budgets,
- Water budgets,
- Material handling procedures,
- Integrated Waste Management Plan (IWMP)
- Interceptor Maintenance Plan (IMP) audits,
- Determining the magnitude of the violation,
- Determining the duration of the violation,
- Establishing the effect of the violation on BWRP compliance with NPDES permit,
- Establishing the effect of the violation on the operation of the BWRP and its collection system,
- Establishing the effect of the violation on the storm water conveyance system

Reviewing the effectiveness of current Best Management Practices (BMPs)
Reviewing the compliance history of the discharger,
Establishing the good faith of the discharger, and
Conducting waste minimization audits.

When the Inspector receives an analysis report showing exceedance of an established pollutant discharge limit, it must be documented in the user's file and an investigation conducted as described above.

If the exceedance is minor (does NOT result in harm, NOT SNC) and an isolated incident, the Inspector shall draft an NOV (See below).

If the exceedance is not a minor and isolated incident, the Inspector shall forward the file to the Enforcement Officer (EO).

On those occasions when the user elects to not cooperate with the Inspector in the conduct of the investigation, the Inspector may turn the case over to the EO.

4. Initiating enforcement activity.

If, upon investigation, a violation presents an imminent hazard to public health, safety or welfare, to the environment, to the collection system, to the BWRP, storm water conveyance system, or to City personnel, the Inspector shall immediately inform the EO and prepare an Administrative Order to Cease and Desist (Cease and Desist Order).

If any violation is immediately correctable, the Inspector will so indicate to the user and expect (and document) an immediate return to compliance.

If, upon investigation, the violation is a serious one (i.e., resulting in harm, or SNC), even though immediately correctable, the Inspector will note the serious nature of the violation on the Inspection Report and inform both the user and the EO as soon as possible.

For minor violations not immediately correctable, after documenting them in an Inspection Report and completing a preliminary investigation, he/she may prepare a Notice of Violation (NOV) for issuance by the EO.

This NOV shall:

- A) Describe the violation:
- B) Cite the appropriate authority;

- C) Provide the user an opportunity to file an objection contesting the finding of violation;
- D) 1) Require an explanation, in writing, of the violation along with a plan for correcting the violation and preventing its recurrence, said explanation and plan to be submitted within 10 working days –OR-
2) Require the violator attend a compliance meeting at the City where the explanation and plan shall be presented, said meeting costs defrayed by a fee specified in the Burbank Fee Resolution assessed to the noncompliant user.
- E) Note that submission of the plan in no way relieves the discharger of liability for any violations.
- F) Include a time frame for correction of the violation and follow-up by the Inspector to verify the return to compliance. (This will also be noted on the Inspection Report (IR)).

Upon completion of the investigation, the Inspector may determine informal enforcement is appropriate to return the user to compliance. Typical violations addressed by informal enforcement action include: need for interceptor pump-outs; misplaced manifests; inadequate spill containment; need flow meter installation; poor implementation of storm water BMPs; and needed IWMP/IMP revisions.

The general criteria for informal enforcement activity is: isolated, no harm; corrective action is within the ability and authority of the site manager; **corrective action can be completed within 30 days**; and the user shows good faith efforts toward returning to compliance.

5. Updating the database.

Whenever enforcement activity occurs, the Inspector shall update the appropriate Enforcement section of the ISRCP database upon his/her return to the office.

The Enforcement will be either Waste Water and/or Storm Water

An Enforcement entry shall include the Name, Address, and ID# of the user, the level of Enforcement (e.g., Informal [1], NOV [2], AO [3], CIVIL [4], CRIMINAL [5], SNC), a summary of the noncompliance, and a summary of ISRCP activity in response to the noncompliance.

6. Follow up noncompliance.

Inspectors shall note due dates for completion of actions by the user and conduct follow up or compliance inspections to verify and document resolution of noncompliance.

If the violation is an exceedance of a discharge limit, compliance shall be verified by collecting a compliance sample. Compliance samples shall be analyzed solely for those parameters previously identified as exceeding the standards.

Enforcement Officer's Responsibilities

1. Respond to enforcement activity initiated by Inspectors.

The EO shall review Cease and Desist Orders, and assume responsibility for their implementation.

The EO shall review reports of violations causing harm or that are SNC, and assume responsibility for their resolution.

The EO may, as appropriate, issue an Administrative Order to Cease and Desist.

The order shall:

- A) Cite the authority under which the Order is issued;
- B) State the findings of noncompliance;
- C) Order the user to cease and desist discharging to the City's collection system;
- D) Describe how the user may appeal the Order;
- E) Include provisions that:
 - a. Compliance with the terms and conditions of the AO shall not relieve the user of its obligation to comply with applicable Federal, State or local law;
 - b. Violation of the AO may subject the user to all penalties available under BMC 25;
 - c. No provision of the AO shall limit the City's authority to issue supplementary or additional

orders or take other action deemed necessary to implement its pretreatment program;

- d. The Order shall be bind on the user, its officers, directors, agents, employees, successors, assigns, and all persons, firms, and corporations acting under, through, or on behalf of the user.

The EO shall review draft NOV, issue them, and assume responsibility for their resolution.

2. Review findings of noncompliance.

Upon notification by the field inspector and/or receipt of the compliance history, the EO may, if appropriate, prepare an Administrative Order to Show Cause for issuance by the Principal Civil Engineer.

The order shall:

- A) Cite the authority under which the Order is issued;
- B) State the findings of noncompliance;
- C) Order the user to appear at a stated time and place;
- D) State the proposed enforcement action, including any proposed fines;
- E) Require the user to explain the findings of noncompliance and show cause why the proposed enforcement action should not occur;
- F) Include provisions that:
 - a. Compliance with the terms and conditions of the AO shall not relieve the user of its obligation to comply with applicable Federal, State or local law;
 - b. Violation of the AO may subject the user to all penalties available under BMC 25;
 - c. No provision of the AO shall limit the City's authority to issue supplementary or additional orders or take other action deemed necessary to implement its pretreatment and storm water programs;
 - d. The Order shall be binding upon the user, its officers, directors, agents, employees, successors, assigns, and

all persons, firms, and corporations acting under, through, or on behalf of the user.

3. Investigate and document any additional findings.

The investigation may include, but shall not be limited to:

- Thorough records review,
- MSDS review,
- Interviewing user personnel,
- Process verification,
- Chemical budgets,
- Water budgets,
- Material handling procedures,
- IWMP/IMP audits,
- Establishing the magnitude of the violation,
- Determining the duration of the violation,
- Establishing the effect of the violation on BWRP compliance with NPDES permit,
- Establishing the effect of the violation on the operation of the BWRP and its collection system,
- Establishing the effect of the violation on the storm water conveyance system
- Determining the impact of an Illicit Connection on the conveyance system
- Determining the extent of an Illicit Discharge
- BMP audits
- Reviewing the compliance history of the discharger, and
- Conducting waste minimization audits.

On those occasions when the user elects to not cooperate in the conduct of the investigation, the EO shall review all available data on the user and may authorize surveillance of the user, including upstream/downstream monitoring in the collection system and/or storm water conveyance system.

The EO may obtain and, in cooperation with the City of Burbank Police Department, exercise an Inspection Warrant from the Superior Court of the County of Los Angeles.

The EO shall ensure that a compliance history is prepared, detailing events surrounding the noncompliance, describing the noncompliance, and setting out the findings of the investigation of the noncompliance.

4. Initiate, continue, escalate, or terminate enforcement activity.

Upon receipt of the explanation and plan to correct & prevent recurrence required by an NOV, the EO will evaluate the plan, documenting the evaluation in the user's file.

If the plan is acceptable (addresses the noncompliance, mitigates its impact, describes reasonable preventative measures, and sets forth reasonable implementation schedule), he/she will so inform the user and monitor progress in an appropriate manner.

If the plan is unacceptable, he/she will so inform the user, identifying those elements which require modification, and direct the modifications be submitted within 5 working days of notification.

If the modifications are unacceptable, or the user does not accomplish the plan, the EO may prepare a compliance history and issue an Administrative Order to Show Cause.

Should the user chose to attend a noncompliance meeting, the EO will schedule and chair said meeting. The user will be presented with the findings of noncompliance by the Inspector and will then explain the noncompliance and present a plan to correct it and prevent its recurrence.

If the plan is acceptable, the EO will enter it into the file and schedule a compliance inspection to verify successful accomplishment.

If the plan is unacceptable, the EO will, with the assistance of the Inspector, negotiate a Consent Order with the user.

The EO may, as a result of a noncompliance meeting, negotiate a Consent Order, prepare an Administrative Order of Compliance containing specific actions required of the user along with specific dates for their accomplishment, or initiate an Administrative Hearing.

5. Assist the Hearing Officer at hearings.

The EO shall ensure the Hearing Officer is consulted for availability prior to serving a user with a Notice to Appear at an administrative hearing. At the hearing, the EO shall present the findings of noncompliance and state the proposed enforcement action, including an appropriate penalty.

At the conclusion of the hearing, the EO shall prepare and issue, at the direction of the Hearing Officer, the appropriate AO, including assessment of fines, or initiate control mechanism revocation proceedings, termination of sewer services, or prepare the file for remission to Counsel for legal action.

ISRCP Manager/ISP Coordinator Responsibilities

1. Review objections to NOVs, schedule and chair a hearing of the objection, and make a determination of the validity of the objection, either rescinding the NOV or denying the objection.
2. Review and issue Administrative Orders, (Cease and Desist Orders, Compliance Orders, Show Cause Orders, Consent Orders).
3. Oversee the implementation of Administrative Orders (Cease and Desist Orders, Compliance Orders, Show Cause Orders, Consent Orders).
4. Assist the Hearing Officer.

Hearing Officer Responsibilities

The Director of Public Works shall designate a Hearing Officer, (whose decisions may be reviewed upon appeal, by the Director) who shall:

1. Conduct administrative civil hearings which may result in issuance of an Administrative Order along with fines appropriate to the noncompliance in accordance with state law.

The Hearing Officer shall employ the same criteria as the Inspector and the EO to determine the appropriate response to the noncompliance brought before him.

The Hearing Officer shall decide, based on the findings of noncompliance and the user's report of mitigating circumstances, the appropriate action the City shall take.

City of Burbank
Industrial Source Reduction and Control Program
Industrial/Commercial Facilities Control Program
Enforcement Response Guide

<u>NONCOMPLIANCE</u>	<u>NATURE OF THE VIOLATION</u>	<u>ENFORCEMENT RESPONSES</u>
UNAUTHORIZED DISCHARGES (No Control Mechanism)		
Unauthorized/ Unpermitted discharge	User unaware of the requirement and no harm to BWRP, or environment	Isolated, No Harm (Flow Diagram B)
	User unaware of requirements and harm to the BWRP, or environment	Isolated, Harm (Flow Diagram C)
	Failure to apply continues after notice by the ISRCP/ISP	Recurring, No Harm (Flow Diagram D)
Nonpermitted discharge (failure to renew)	User has not submitted application within 10 days of due date	Isolated, No Harm (Flow Diagram B)
DISCHARGE LIMIT VIOLATION		
Exceedance of local or Federal Standard (Permit limit)	Isolated, not significant	Isolated, No Harm (Flow Diagram B)
	Isolated, significant (no harm)	- AO to develop spill prevention plan and fine
	Isolated, harm to BWRP or environment	Isolated, Harm (Flow Diagram C)
	Recurring, not significant (no harm to BWRP or environment)	Recurring , No Harm (Flow Diagram D)
	Recurring, significant (harm)	Recurring, Harm (Flow Diagram E)
MONITORING AND REPORTING VIOLATIONS		
Reporting violation	Report is improperly signed or certified	Isolated, No Harm (Flow Diagram B)
	Report is improperly signed or certified after notice by BWRP	Recurring, No Harm (Flow Diagram D)
	Isolated, not significant (e.g., 5 days late)	Isolated, No Harm (Flow Diagram B)
	Significant (e.g., report 30 days or more late)	- AO to submit with fine per additional day
	Reports are consistently late or no reports at all	Recurring, Harm (Flow Diagram E)
	Failure to report spill or changed discharge (no harm)	Isolated, No Harm (Flow Diagram B)
	Failure to report spill or changed discharge (results in harm)	Isolated, Harm (Flow Diagram C)
	Repeated failure to report spills	Recurring, Harm (Flow Diagram E)
	Falsification	Recurring, Harm (Flow Diagram E)

<u>NONCOMPLIANCE</u>	<u>NATURE OF THE VIOLATION</u>	<u>ENFORCEMENT RESPONSES</u>
Failure to monitor correctly	Failure to monitor all pollutants as required by permit	Isolated, Harm (Flow Diagram C)
	Recurring failure to monitor	Recurring, No Harm (Flow Diagram D)
Improper sampling	Evidence of intent	Recurring, Harm (Flow Diagram E)
Failure to install monitoring equipment	Delay of less than 30 days	Isolated, No Harm (Flow Diagram B)
	Delay of 30 days or more	Isolated, Harm (Flow Diagram C)
	Recurring, violation of AO	Recurring, Harm (Flow Diagram E)
Compliance schedules (in permit)	Missed milestone by less than 30 days, or will not affect final milestone	Isolated, Harm (Flow Diagram C)
	Missed milestone by more than 30 days, or will affect final milestone (good cause for delay)	Recurring, No Harm (Flow Diagram D)
	Missed milestone by more than 30 days, or will affect final milestone (no good cause for delay)	Recurring, Harm (Flow Diagram E)
	Recurring violation or violation of schedule in AO	Recurring, Harm (Flow Diagram E)
OTHER CONTROL MECHANISM VIOLATIONS		
Wastestreams are diluted in lieu of treatment	Initial violation	-NOV
	Recurring	Recurring, Harm (Flow Diagram E)
Failure to mitigate noncompliance or halt production	Does not result in harm	Isolated, No Harm (Flow Diagram B)
	Does result in harm	Recurring Harm (Flow Diagram E)
Failure to operate and maintain pretreatment facility or equipment	Does not result in harm	Isolated, No Harm (Flow Diagram B)
	Does result in harm	Recurring, No Harm (Flow Diagram D)
VIOLATIONS DETECTED DURING SITE VISITS		
Entry denial	Entry denied or consent withdrawn: copies of records denied	- Obtain warrant and return to user
Illegal discharge	No harm to BWRP, or environment	Isolated, No Harm (Flow Diagram B)
	Discharge causes harm or evidence of intent/negligence	Recurring, No Harm (Flow Diagram D)
	Recurring, violation of AO	Recurring, Harm (Flow Diagram E)
Improper sampling	Unintentional sampling at incorrect location	Isolated, No Harm (Flow Diagram B)
	Unintentionally using incorrect sample types	Isolated, No Harm (Flow Diagram B)

<u>NONCOMPLIANCE</u>	<u>NATURE OF THE VIOLATION</u>	<u>ENFORCEMENT RESPONSES</u>
	Unintentionally using incorrect sample collection techniques	Isolated, No Harm (Flow Diagram B)
Inadequate record keeping	Inspector finds files incomplete sample to missing (no evidence of intent)	Isolated, No Harm (Flow Diagram B)
	Recurring	Recurring, No Harm (Flow Diagram D)
Failure to report additional monitoring	Inspection finds additional files	- NOV
	Recurring	Recurring, No Harm (Flow Diagram D)
BEST MANAGEMENT PRACTICES (BMPs)		
Lack of BMPs	User unaware of the requirement, no harm to the storm water conveyance system or environment	Isolated, No Harm (Flow Diagram B)
	User unaware of the requirement, harm to the storm water conveyance system or environment	Isolated, Harm (Flow Diagram C)
	Recurring	Recurring, No Harm (Flow Diagram D)
Ineffective BMPs	User unaware of the requirement, no harm to the storm water conveyance system or environment	Isolated, No Harm (Flow Diagram B)
	User unaware of the requirement, harm to the storm water conveyance system or environment	Isolated, Harm (Flow Diagram C)
	Recurring	Recurring, No Harm (Flow Diagram D)
ILLICIT CONNECTIONS		
Presence of an Illicit Connection	User unaware of the connection, no harm to the storm water conveyance system or environment	Isolated, No Harm (Flow Diagram B)
	User unaware of the connection, harm to the storm water conveyance system or environment	Isolated, Harm (Flow Diagram C)
	Recurring	Recurring, No Harm (Flow Diagram D)
ILLICIT DISCHARGES		
Presence of Illicit Discharges	User unaware of the discharge, no harm to the storm water conveyance system or environment	Isolated, No Harm (Flow Diagram B)
	User unaware of the discharge, harm to the storm water conveyance system or environment	Isolated, Harm (Flow Diagram C)
	Recurring	Recurring, No Harm (Flow Diagram D)

Enforcement Matrix (showing Title and Action allowed)

	Informal	NOV	Administrative Orders				Civil Action	Criminal Complaint	Terminate Service
			CDO	Consent Order	Show Cause	Compliance Order			
Inspector	I, C	I							
EO		S,C	I,C	I,C	I,C	I,C			
ISRCP Manager/ ISP Coordinator			S	S	S	S	I,C	I,C	I,C
Hearing Officer							S	S	S

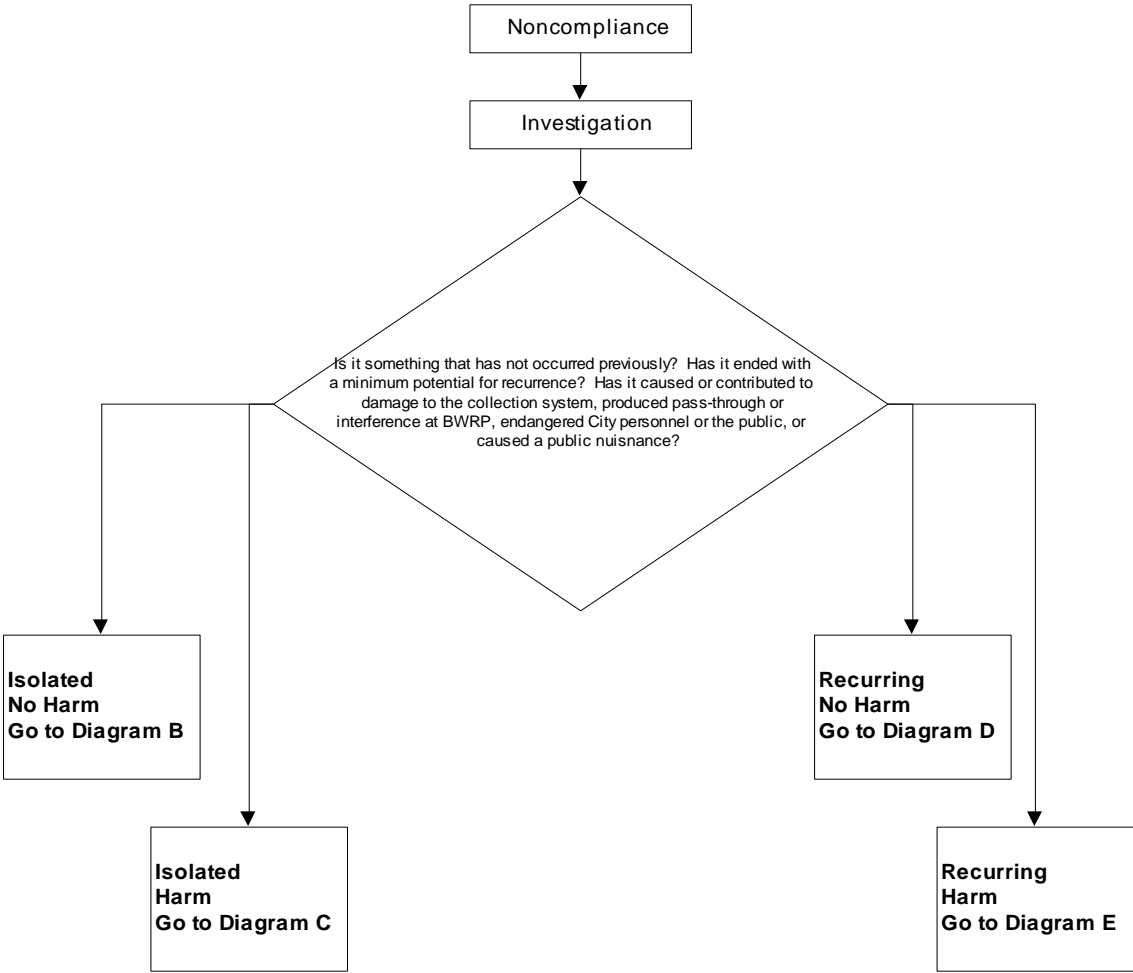
I means 'initiate'

S means 'sign'

C means 'carry out actions'

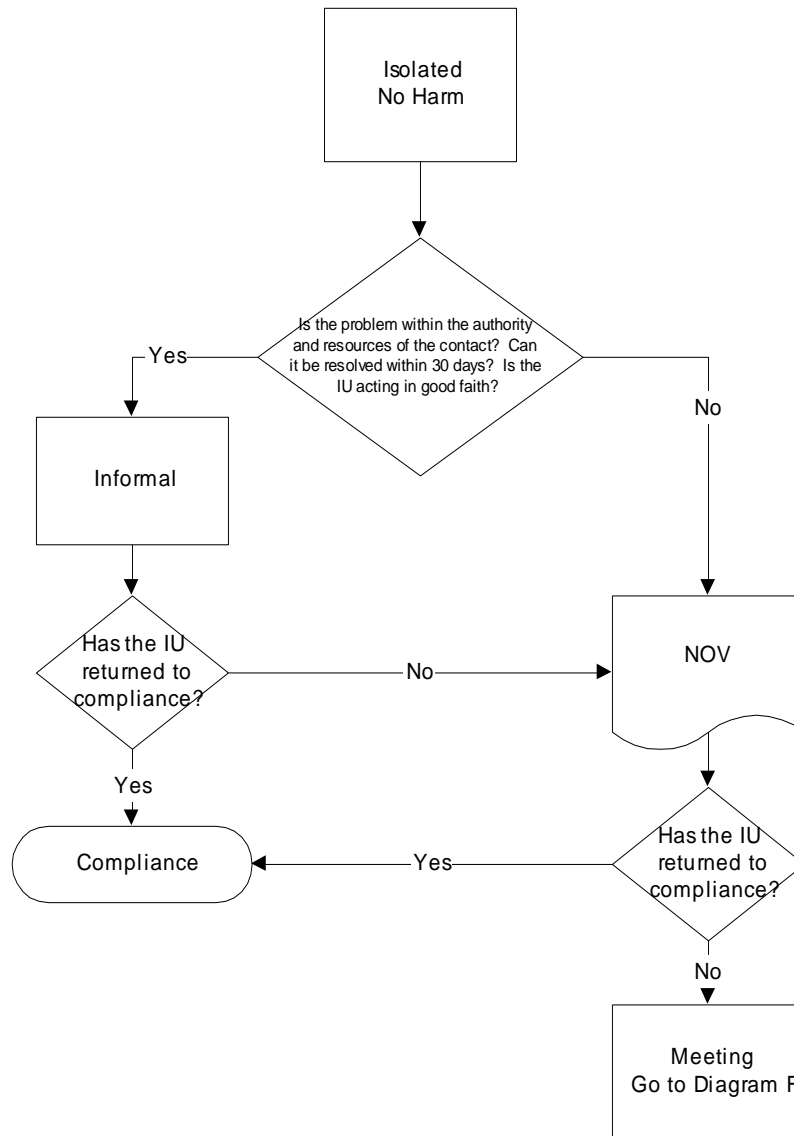
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Flow Diagram A



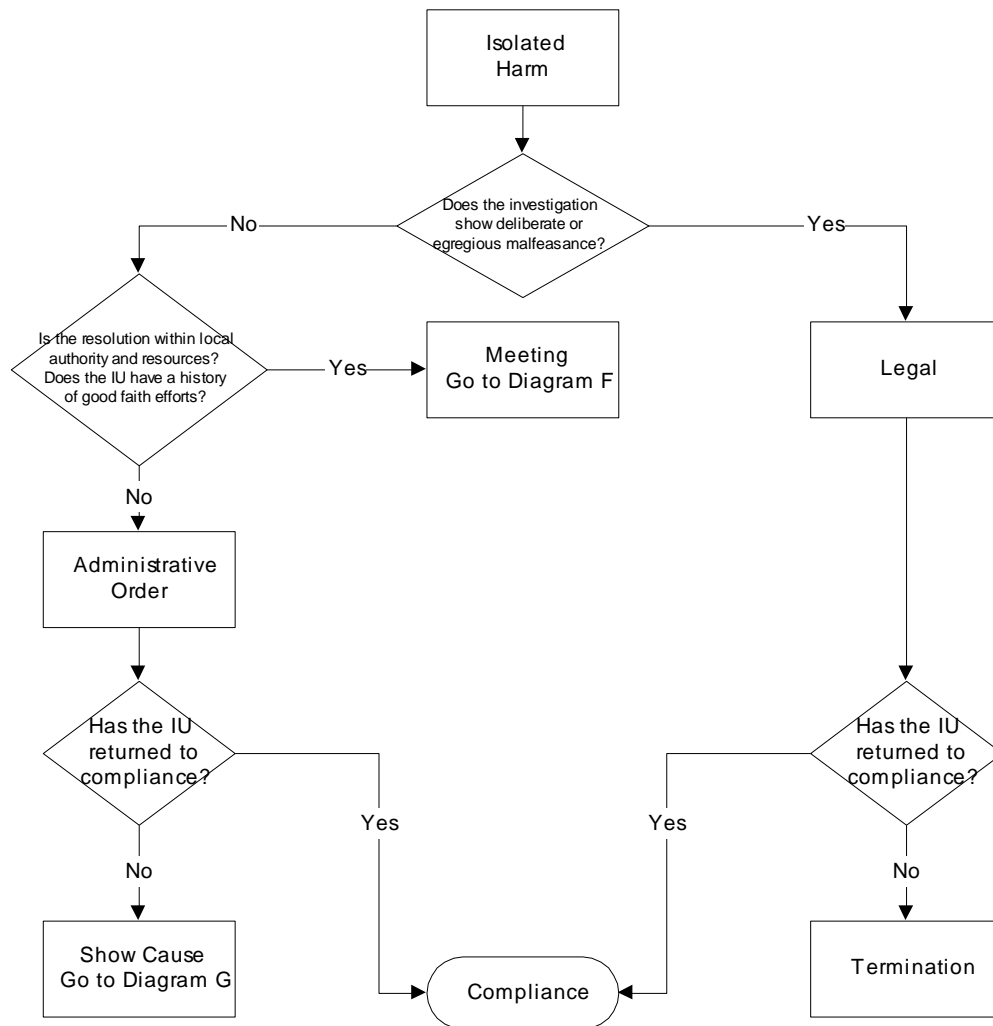
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Flow Diagram B



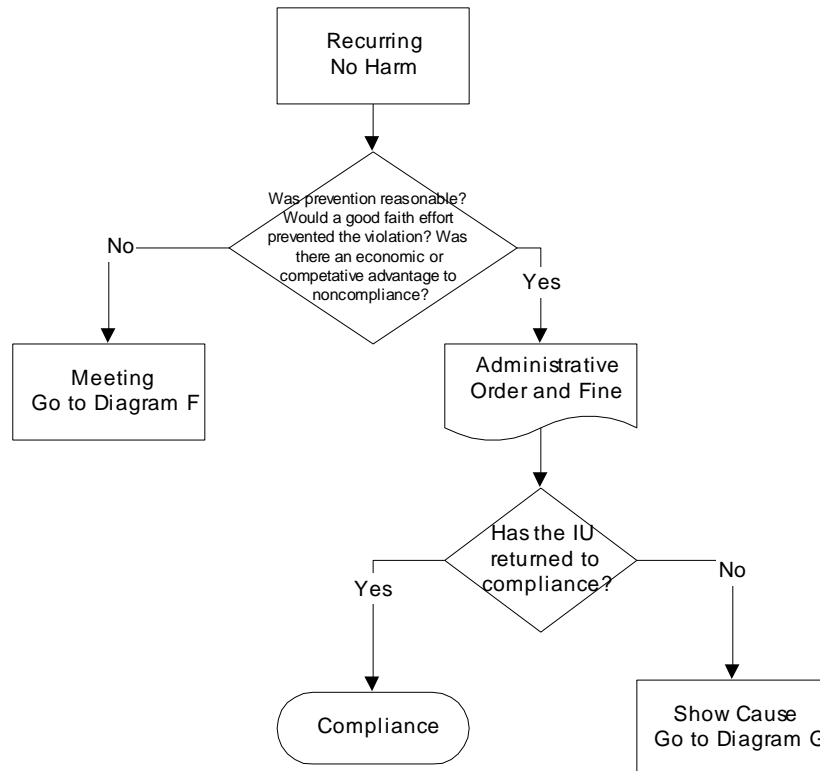
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Flow Diagram C



Enforcement Response Guide

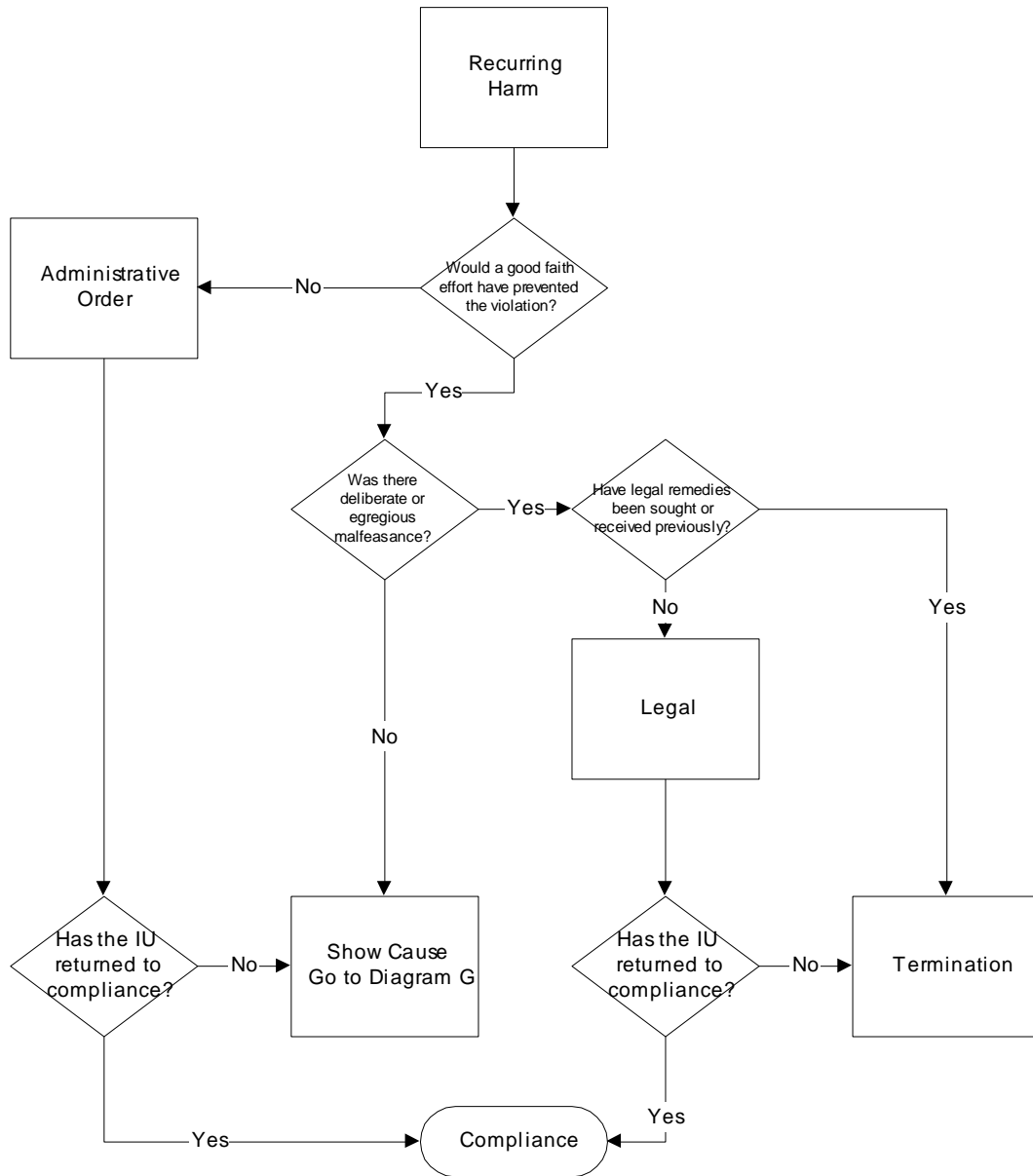
Flow Diagram D



Note: Show Cause means a Hearing, at which the IU is Ordered to Show Cause why the City should not implement a proposed, written course of action intended to resolve the IU's non-compliance and recover both the City's associated costs and any economic benefit accrued by the IU due to the non-compliance.

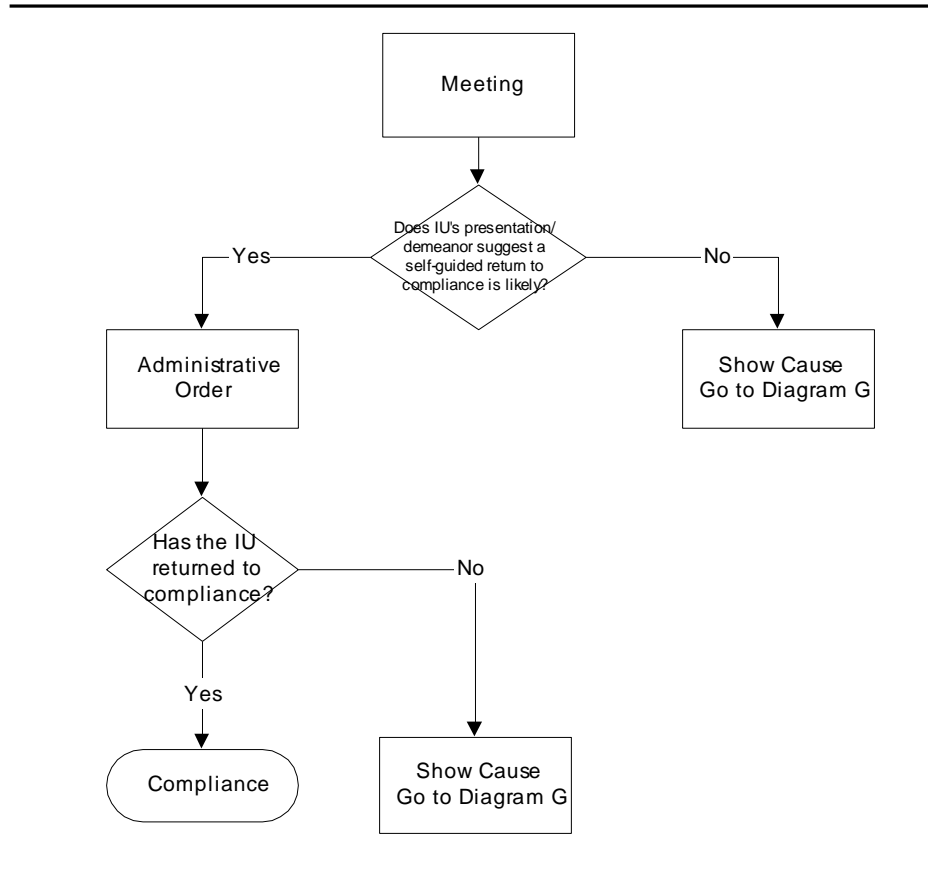
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Flow Diagram E



Enforcement Response Guide

Flow Diagram F



Enforcement Response Guide

Flow Diagram G

